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**Via Messenger**

Mr. William Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, DC 20036

July 30, 1993

RECEIVED**JUL 30 1993**FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Re: PR Docket No. 92-235;
Reply Comments of the Intelligent-Vehicle-Highway Society of America

Dear Mr. Caton:

On behalf of the Intelligent-Vehicle-Highway Society of America ("IVHS AMERICA"), we are writing to express our informal reply comments to the FCC's initiative to reform the Private Land Mobile Radio bands below 512 MHz. In its initial filing, IVHS AMERICA expressed its views as supportive, in principle, of the reforming initiative, noting that IVHS services would likely be a new user of this additional PLMS channel capacity. Other commentors, such as the American Association of State Highway Transportation Officials, concur with this view.

The comments have provided detailed and substantive discussion of the marketplace impact of key aspects of the proposal, as originally stated. Specifically, some commenting parties, while supportive of the general concept of initiatives to promote greater spectrum efficiency, envision potentially serious adverse effects related to a mandated timetable for conversion to 5/6.25 kHz bandwidth systems within an accelerated period. These parties suggest instead that a timetable be established for accommodation of 12.5 kHz bandwidth systems, coupled with the opportunity to revisit the issue at an agreed period in the future. Other commentors, however, suggest a more expedited timetable for very narrowband implementation.